

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

**Somerville Public Schools, et al.,**

Plaintiffs,

**v.**

**Donald J. Trump, et al.,**

Defendants.

**Civil Case No. 1:25-cv-10677**

Declaration of Rachel F. Homer

Pursuant to 28 U.S.C. § 1746, I, Rachel F. Homer, hereby declare under penalty of perjury that the following is true and correct.

1. I am an attorney at Democracy Forward Foundation. I am admitted to the U.S. District Court for the District of Massachusetts, and I appear on behalf of the Plaintiffs in this action.
2. I submit this declaration in support of the Plaintiffs' Motion for Preliminary Injunction pursuant to Federal Rule of Civil Procedure 65.
3. Attached as Exhibit 1 to this declaration is a true and accurate copy of the Department of Education's press release on March 11, 2025, announcing mass terminations (the Mass Termination Order) across the Department.
4. Attached as Exhibit 2 to this declaration is a true and accurate copy of a Department of Education organizational chart showing offices eliminated contemporaneous with the Mass Termination Order, dated March 11, 2025.

5. Attached as Exhibit 3 to this declaration is a true and correct copy of a spreadsheet generated by the American Federation of Government Employees showing a list of bargaining unit employees eliminated in the Mass Termination Order.

6. Attached as Exhibit 4 to this declaration is a true and correct copy of a contingency plan released by the Department of Education in September 2018 in anticipation of a government shutdown.

7. Attached as Exhibit 5 to this declaration is a true and correct copy of Dr. Elizabeth Linos' expert report concerning the Mass Termination Order's likely effects on the Department of Education's ability to perform its core functions.

8. Attached as Exhibit 6 to this declaration is a true and correct copy of the Declaration of Emma Leheny, former Acting General Counsel and Principal Deputy General Counsel in the Department of Education's Office of General Counsel.

9. Attached as Exhibit 7 to this declaration is a true and correct copy of the Declaration of Dr. Rubén Carmona, superintendent of the Somerville Public Schools.

10. Attached as Exhibit 8 to this declaration is a true and correct copy of the Declaration of Katherine Neas, Chief Executive Officer of The Arc of the United States.

11. Attached as Exhibit 9 to this declaration is a true and correct copy of the Declaration of Maureen Binienda, interim superintendent of the Easthampton School District.

12. Attached as Exhibit 10 to this declaration is a true and correct copy of the Declaration of Dr. Rachel Monarrez, superintendent of the Worcester Public Schools.

13. Attached as Exhibit 11 to this declaration is a true and correct copy of the Declaration of Daniel McNeil, general counsel for the American Federation of Teachers.

14. Attached as Exhibit 12 to this declaration is a true and correct copy of the

Declaration of Jessica Tang, president of the American Federation of Teachers Massachusetts.

15. Attached as Exhibit 13 to this declaration is a true and correct copy of the Declaration of Steven Ury, general counsel for the Service Employees International Union.

16. Attached as Exhibit 14 to this declaration is a true and correct copy of the Declaration of Dr. Todd Wolfson, president of the American Association of University Professors.

17. Attached as Exhibit 15 to this declaration is a true and correct copy of the Declaration of Robert J. Van Campen, general counsel for the American Federation of State, County and Municipal Employees Council 93.

18. Attached as Exhibit 16 to this declaration is a true and correct copy of the Exhibit Table of Contents.

Signed under the penalties of perjury this 1st day of April 2025.

Respectfully submitted,

/s/ Rachel F. Homer  
Counsel for Plaintiffs  
Democracy Forward Foundation

**CERTIFICATE OF SERVICE**

I certify that this document was filed through the CM/ECF system and will be sent electronically to the registered participants as identified in the Notice of Electronic Filing (NEF), and will be provided to the following counsel for the defendants by email:

Brad Rosenberg  
Special Counsel  
Federal Programs Branch  
U.S. Department of Justice  
Brad.Rosenberg@usdoj.gov

/s/ Rachel F. Homer  
Rachel F. Homer